



U.S. Department of Energy
Office of River Protection

P.O. Box 450
Richland, Washington 99352

0055450

01-TOD-T023

SEP 27 2001

Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 W. Fourth Avenue
Kennewick, Washington 99336

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OCT 05 2001
EDMC

Dear Mr. Wilson:

**RESPONSE TO THE STATE OF WASHINGTON DEPARTMENT OF ECOLOGY'S
(ECOLOGY) ACTION ITEMS FOR CATCH TANKS 241-A-350, AZ-151, AND AX-152**

- References:
1. Ecology letter from M. J. Brown to H. L. Boston, ORP and M. P. DeLozier, CHG, "July 18, 2000 Submittal Per Administrative Order 00NWPKW-1250 and 00NWPKW-1251," dated August 1, 2001.
 2. ORP letter from C. E. Clark to M. A. Wilson, Ecology, "Transmittal of Administrative Orders No. 00NWPKW-1250 and No. 00NWPKW-1250 Action 5 Report," dated December 18, 2000.

In response to the action items contained in Reference 1, the U. S. Department of Energy (DOE), Office of River Protection (ORP) addresses each item as follows:

Action Item 1:

"Conduct static leak tests of AZ-151 and A-350 immediately and continue to conduct static leak tests of these catch tank systems annually thereafter, until these tank systems are removed from service. The USDOE may temporarily exceed operational safety limits for the sole purpose of conducting static leak tests in these tanks, as long as test liquids do not exceed the height of the primary tank's structure (i.e. tank liners, overflow outlets, or vaults)."

ORP Response:

As discussed with Ecology personnel, a static leak test of the AZ-151 Catch Tank will be completed as soon as it is operationally practical, but not later than March 30, 2002. The leak test is contingent on the next scheduled outage of the 241-AZ Tank Farm primary ventilation system. Catch Tank AZ-151 is the receiving tank for condensate generated during the operation of the 702-AZ Ventilation System. In order to perform a static leak test, the 702-AZ Ventilation must be shutdown for a period of three to five days in order for Catch Tank AZ-151 to stabilize and maintain an equilibrium level.

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A static leak test of Catch Tank A-350 was recently recorded by tank level instrumentation during the period of June 25, 2001, to July 1, 2001. As shown in Attachment 1, the tank was determined not to be leaking. Per Action Item 1, this recent leak test meets the annual requirement of conducting annual static leak tests and will be conducted on an annual basis.

Action Item 2:

"By September 28, 2001, submit a schedule, for Ecology's approval, for removal of these tanks from service on or before June 30, 2005. The schedule shall include subsequent stabilization, isolation, and monitoring of these tank systems, as described in section 5.A of the Administrative Order. This schedule must include all costs and be coordinated to have minimal impact to tank farm operations. This schedule may be coordinated with similar deliverables required per section 5.A of the Administrative Order."

ORP Response:

ORP will defer submission of a schedule regarding removal of three catch tanks until completion of a Conceptual Design Review (CDR) which is scheduled to start in December 2001, and is expected to last approximately six months. Since the CDR will closely examine the entire Double-Shell Tank (DST) transfer system, a realistic and detailed schedule is not possible because of the many complexities of the piping systems and potential effects to tank farm operations and retrieval support of Single-Shell Tanks (SST) and the Waste Treatment Plant integration. As discussed with Ecology personnel, the schedule and budget information of these three tanks will be forwarded by August 30, 2002.

Action Item 3:

"By September 28, 2001, confirm that AX-152 is free of waste liquids and report these findings to Ecology. Liquids discovered in this tank system must be drained immediately."

ORP Response:

Catch Tank AX-152 was declared a leaker by CHG's Plant Review Committee and removed from service in March 2001. The tank was subsequently drained of all liquid. As shown in Attachment 2, tank level measurements indicates the tank has been empty since March 2, 2001.

Action Item 4:

"Upon removal from service, the USDOE must identify the AX-152, AZ-151, and A-350 tank systems as part of the tank systems designated for closure per Hanford Federal Facility Agreement and Consent Order Milestone M-45 by letter to Ecology."

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ORP Response:

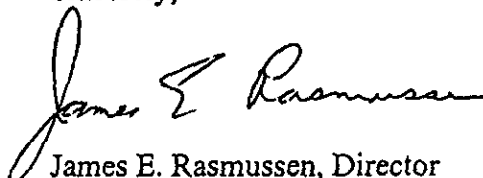
ORP has identified 2 of the 3 catch tanks in closure plans.

Catch Tanks AZ-151 and A-350 are identified in the DST System Closure Plan previously submitted to Ecology per Reference 2.

AX-152 will be included in the SST System Closure Work Plan per M-45-06-T05.

If you have any questions, please contact me, or your staff may contact Victor Callahan, Technical Operations Division, (509) 373-9880.

Sincerely,



James E. Rasmussen, Director
Environmental Management Division

TOD:VLC

Attachments (2)

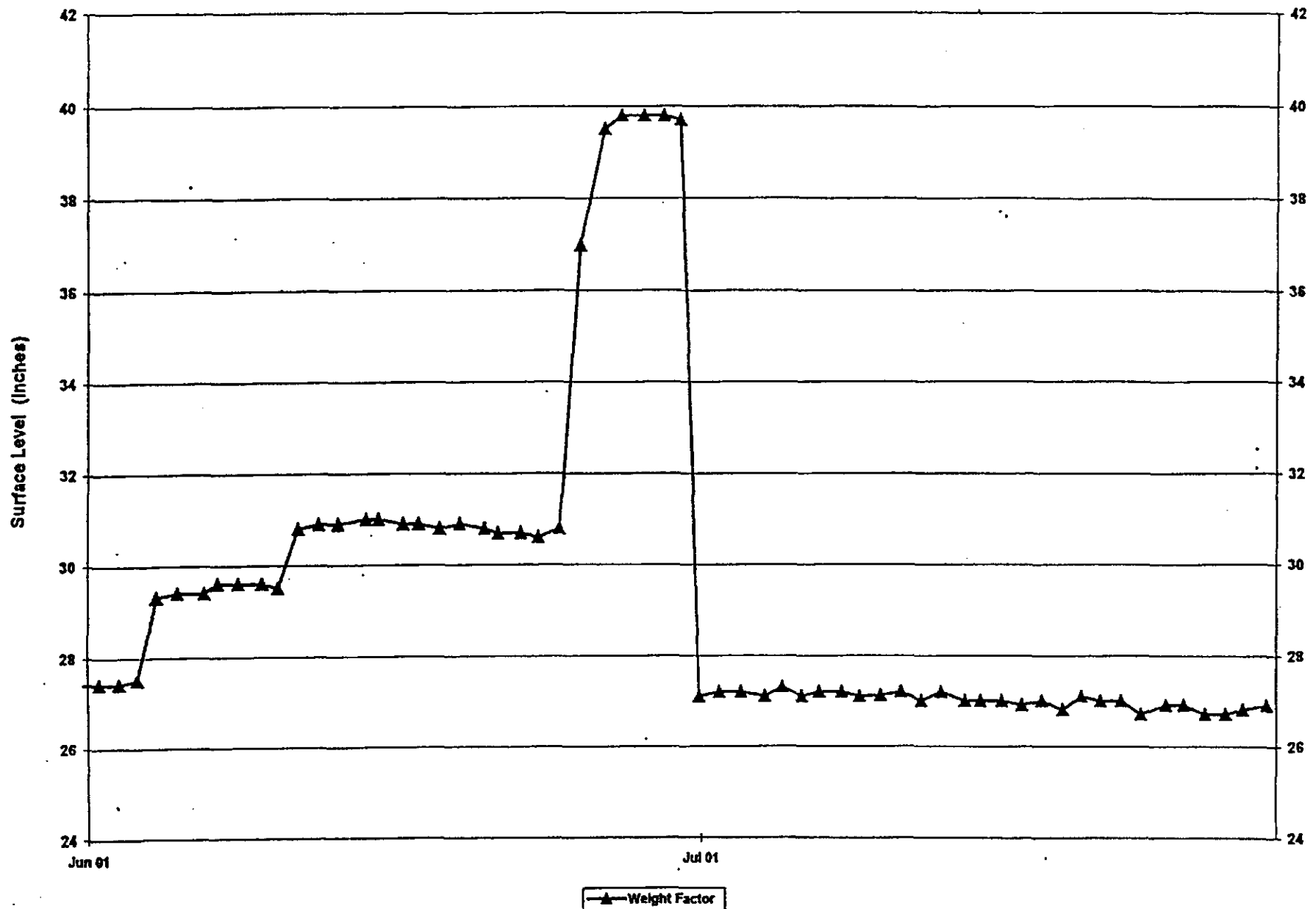
cc: R. Gay, CTUIR
P. Sobotta, NPT
R. Jim, YN
E. Savage, BNI
J. G. Field, CHG
J. W. Hunt, CHG
F. R. Miera, CHG
T. R. Pauly, CHG
M. A. Payne, CHG
D. J. Washenfelter, CHG
M. Brown, Ecology
D. Bartus, EPA, c/o Ecology
D. G. Singleton, Ecology
R. F. Stanley, Ecology
N. H. Uziemblo, Ecology
B. W. Wilson, Ecology
D. R. Sherwood, EPA
J. S. Hertz, FHI
O. S. Kramer, FHI
T. Martin, HAB
K. Niles, Oregon Energy
E. M. Mattlin, RL
Administrative Record

TPA Administrative Record

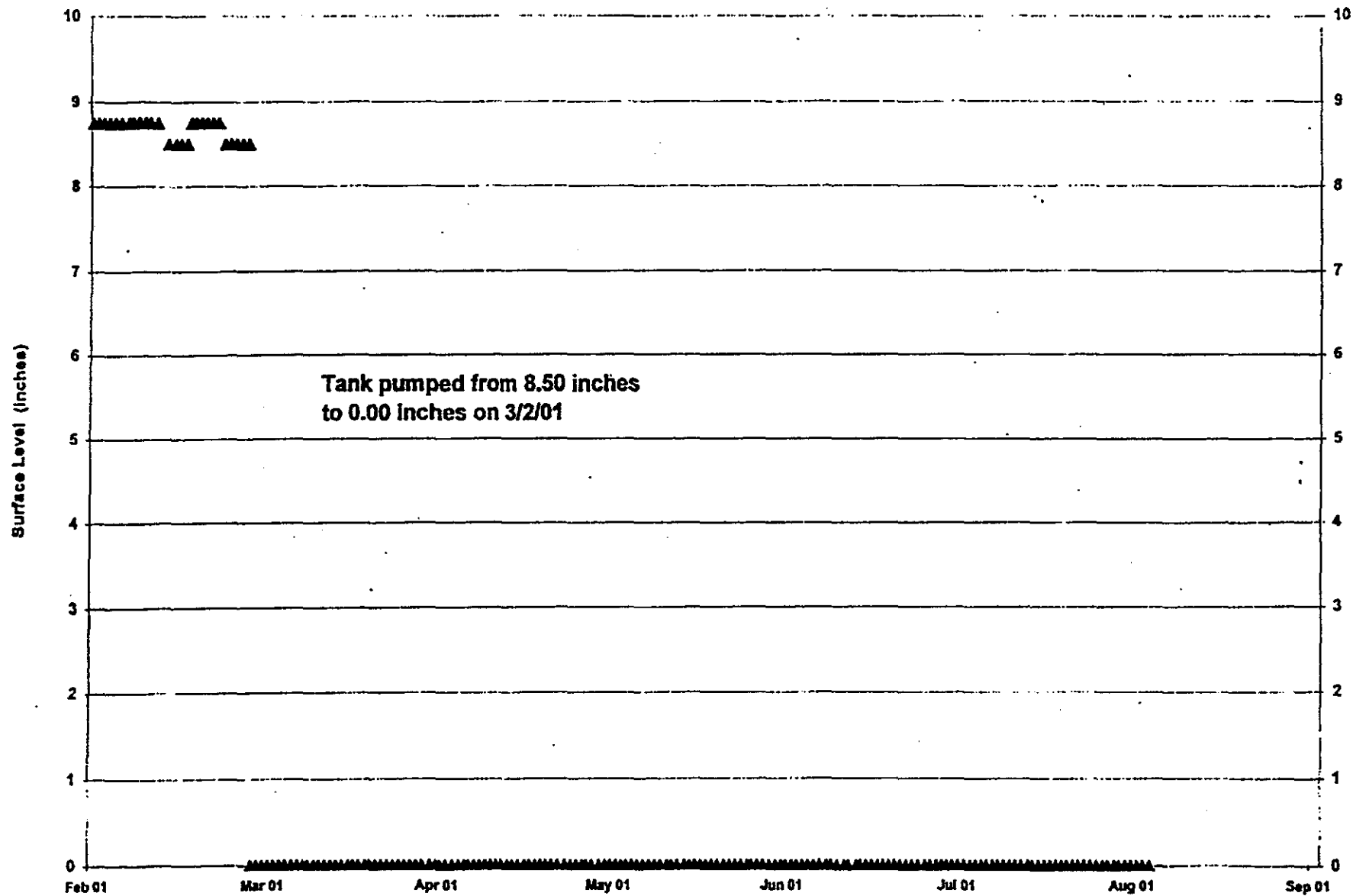
Retrieval Date: 06/24/2001
Start Date: 06/01/2001
End Date: 06/01/2001

Tank A350

Data Types:
GOOD
TRANSCRIBED



Tank AX152



Tank pumped from 8.50 inches
to 0.00 inches on 3/2/01

▲ Manual Tape